

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

X

JOHN WAITE, an individual; KASIM SULTON,  
an individual; SUSAN STRAW HARRIS p/k/a  
SYD STRAW, an individual; LEONARD  
GRAVES PHILLIPS, an individual; STAN  
SOBOL a/k/a STAN LEE, an individual; STEVE  
WYNN, an individual; DENNIS MEHAFFEY,  
p/k/a DENNIS DUCK, an individual; and JOEL  
DAVID PELLISH, p/k/a DAVE PROVOST, an  
individual; and on behalf of all others similarly  
situated,

Plaintiffs,

v.

UMG RECORDINGS, INC., a Delaware  
corporation doing business as Universal Music  
Group; and CAPITOL RECORDS, LLC, a  
Delaware limited liability company;

Defendants.

X

No. 1:19-cv-01091(LAK)

ORAL ARGUMENT REQUESTED

**DECLARATION OF RYAN E. CRONIN  
IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANT CAPITOL RECORDS, LLC'S MOTION FOR SUMMARY JUDGMENT AS TO ITS  
COUNTERCLAIMS AGAINST PLAINTIFF AND COUNTERCLAIM DEFENDANT SUSAN STRAW  
HARRIS**

I, Ryan E. Cronin, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at law admitted to the bar of this Court, and I am a partner in the law firm of Blank Rome LLP, attorneys for Plaintiffs Kasim Sulton, Susan Straw Harris p/k/a Syd Straw, Leonard Graves Phillips, Stan Sobol p/k/a Stan Lee, Steve Wynn, Dennis Mehaffey p/k/a Dennis Duck, and David Pellish p/k/a Dave Provost, on behalf of themselves and all others similarly situated (collectively, "Plaintiffs"). I make this declaration in support of Plaintiffs' Memorandum of Law in Opposition to Defendant Capitol Records, LLC's Motion for Summary

Judgment as to its Counterclaims Against Plaintiff and Counterclaim Defendant Susan Straw Harris, filed concurrently herewith.

2. A true and correct copy of relevant excerpts from the deposition of Plaintiff Susan Straw Harris, dated December 16, 2021, is attached hereto as Exhibit 1.

3. A true and correct copy of Exhibit 86 to the deposition of Plaintiff Susan Straw Harris, reflecting payments to Susan Straw Harris from Bandcamp, which was produced in this litigation bearing the Bates number BANDCAMP00001, is attached hereto as Exhibit 2.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed: New York, New York

Dated: May 27, 2022

/s/ Ryan E. Cronin  
Ryan E. Cronin